

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA**

**IN RE**

**CHRIS PAPASARANTOU**

**DEBTOR(S)**

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)  
)  
)  
)

**CASE NO. 16-14195 NLJ  
CHAPTER 13**

**MOTION FOR COMPENSATION AND BRIEF IN SUPPORT  
WITH NOTICE AND OPPORTUNITY FOR HEARING**

COMES NOW Applicant Michael J. Rose and requests that this Court issue an order authorizing payment of compensation in this case. In support, Applicant states as follows.

1. This case was filed 10-19-16. The case was dismissed prior to confirmation because Debtor failed to make all payments due under the plan and failed to provided requested tax returns.
2. Applicant has provided a benefit to the bankruptcy estate and to Debtor. The work performed by Applicant was necessary at the time at which the work was performed, and was performed in a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks. The work was performed at Debtor's request and for his benefit. 11 USC 330(A)(4)(2)(B).
3. Applicant has provided professional services in this case and is entitled to compensation pursuant to 11 U.S.C. 330(4)(B) and *In re Zamora*, 251 BR 591 (D.Colo.2000); *In re Seneca Oil*, 65 BR 902 (Brktcy.W.D.Okla.1986); *In re Vista Foods, USA, Inc.*, 234 BR 121 (Bkrtcy.W.D.Okla. 1999); *In re Ingersoll*, 238 BR 202 (D.Colo.1999); *Matter of Kindhart*, 160 F.3d 1176 (7<sup>th</sup> Cir.1998).
4. Undersigned counsel was paid \$500 prior to filing the instant case. Undersigned counsel requests that the Court order he be paid \$1,250.00 from funds on hand with the Chapter 13

Trustee, pursuant to applicable law and the Court's Local Chapter 13 Guidelines, to the extent that such funds are available.

WHEREFORE, premises considered, Applicant respectfully requests that this Court enter an order approving the payment of fees for professional services in the amount of \$1,250.00, and that such funds be paid to Applicant pursuant to the Court's Local Chapter 13 Guidelines to the extent such funds are available from the Chapter 13 Trustee.

Respectfully submitted:

S/ MIKE ROSE  
Michael J. Rose, OBA No. 15523  
MICHAEL J ROSE PC  
4101 Perimeter Center Drive, Suite 120  
Oklahoma City, OK 73112  
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(405) 605-3758 facsimile  
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ATTORNEY FOR DEBTOR

#### **NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want to the Court to grant the relief requested, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Ave., Oklahoma City, OK 73102, no later than 21 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

**The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f)**

**CERTIFICATE OF SERVICE**

Undersigned further certifies that on 1-26-17, the foregoing Motion for Compensation was served, via United States Mail, 1<sup>st</sup> class postage pre-paid, and properly addressed to the following:

All creditors on the attached mailing matrix

s/ MIKE ROSE  
Mike Rose

Label Matrix for local noticing  
1087-5  
Case 16-14195  
Western District of Oklahoma  
Oklahoma City  
Thu Jan 26 12:18:25 CST 2017

Oklahoma Tax Commission  
General Counsel's Office  
100 N. Broadway Ave., Ste 1500  
Oklahoma City, OK 73102-8601

United States of America, ex. rel., Internal  
210 Park Ave., Ste. 400  
Oklahoma City, OK 73102-5602

USBC Western District of Oklahoma  
215 Dean A. McGee  
Oklahoma City, OK 73102-3426

Acct Mgmt Resources Ll  
2915 N Classen Blvd  
Oklahoma City OK 73106-5400

Arvest Bank  
201 Ne A St  
Bentonville AR 72712-5346

Arvest Bank  
4600 SE 29th St, Suite 420  
Del City, OK 73115-3430

Caine & Weiner  
Po Box 5010  
Woodland Hills CA 91365-5010

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

Cb/vicscrt  
Po Box 182789  
Columbus OH 43218-2789

Chase Card  
Po Box 15298  
Wilmington DE 19850-5298

Com Serv Grp/Sterling Payment Tech  
P.O. Box 20427  
Tampa FL 33633-0001

Fms Inc  
4915 S Union Ave  
Tulsa OK 74107-7839

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Nationstar Mortgage Ll  
350 Highland  
Houston TX 77009-6623

Oklahoma Tax Commission  
Attn: Bankruptcy Division  
120 N Robinson Ste 2000  
Oklahoma City OK 73102-7471

Shapiro & Cejda, LLC  
770 NE 63rd St  
Oklahoma City OK 73105-6423

Springleaf  
Po Box 64  
Evansville IN 47701-0064

Syncb/samsclub Commerc  
P.O. Box 965005  
Orlando FL 32896-5005

US Attorney's Office/Oklahoma  
210 Park Ave., #400  
Oklahoma City OK 73102-5628

United States Trustee  
United States Trustee  
215 Dean A. McGee Ave., 4th Floor  
Oklahoma City, OK 73102-3479

Chris Nick Papasasantou  
8514 N Georgia Ave  
Oklahoma City, OK 73114-1217

John T. Hardeman  
PO Box 1948  
Oklahoma City, OK 73101-1948

Mike J Rose  
4101 Perimeter Center Drive  
Suite 120  
Oklahoma City, OK 73112-2309

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank Usa N  
15000 Capital One Dr  
Richmond VA 23238

Internal Revenue Service  
PO Box 745  
District Director  
Chicago IL 60690

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Nationstar Mortgage LLC	(d)Oklahoma Tax Commission	End of Label Matrix	
	General Counsel's Office	Mailable recipients	23
	100 N. Broadway Ave., Suite 1500	Bypassed recipients	2
	Oklahoma City, OK 73102-8601	Total	25